

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:) Chapter 11
)
FRANCHISE GROUP, INC., et al.,) Case No. 24-12480 (JTD)
)
) (Jointly Administered)
Debtors.)
) Re: Docket Nos. 7, 128
)
) Obj. Deadline: 12/3/24, 4:00 p.m.
) Hearing Date: 12/10/24, 10:00 a.m.
)

VERIFIED STATEMENT PURSUANT TO RULE 2019
OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE

Pursuant to the provisions of Rule 2019 of the Federal Rules of Bankruptcy Procedure, Russell R. Johnson III of the Law Firm of Russell R. Johnson III, PLC files this Verified Statement of his firm's (the "Firm") multiple representations in this case of the following utility companies (the "Utilities") that provided prepetition utility goods/services to the Debtors, and continue to provide post-petition utility goods/services to the Debtors:

1. The names and addresses of the Utilities represented by the Firm are:

A. Entergy Arkansas, LLC
Entergy Louisiana, LLC
Entergy Mississippi, LLC
Entergy Texas, Inc.
Attn: Jon Majewski
Entergy Credit Department
Building 1, L-JEF-359, 4809 Jefferson Hwy.
Jefferson, Louisiana 70121

- B. Salt River Project
Anthony Beck, Customer Credit Services PAB21T
1667 N. Priest Drive
Tempe, Arizona 85288-1231
- C. Florida Power & Light Company
Attn: Knecole Stroman
Revenue Recovery Department RRD/LFO
4200 W Flagler St
Coral Gables, Florida 33134
- D. Tucson Electric Power Company
Attn: Adam D. Melton, Esq.
Assistant General Counsel - Litigation
88 E. Broadway Blvd.
HQE910
Tucson, Arizona 85701
- E. American Electric Power
Attn: Jason Reid
1 Riverside Plaza, 13th Floor
Columbus, Ohio 43215
- F. Ohio Edison Company
Potomac Edison Company
West Penn Power Company
Pennsylvania Electric Company
Monongahela Power Company
Metropolitan Edison Company
Pennsylvania Power Company
Jersey Central Power & Light Company
Toledo Edison Company
The Cleveland Electric Illuminating Company
Attn: Kathy M. Hofacre
FirstEnergy Corp.
76 S. Main St., A-GO-15
Akron, Ohio 44308
- G. Georgia Power Company
Attn: Daundra Fletcher
2500 Patrick Henry Parkway
McDonough, Georgia 30253

- H. Baltimore Gas and Electric Company
Atlantic City Electric Company
Delmarva Power & Light Company
Commonwealth Edison Company
PECO Energy Company
The Potomac Electric Power Company
Attn: Lynn R. Zack, Esq.
Assistant General Counsel
Exelon Corporation
2301 Market Street, S23-1
Philadelphia, Pennsylvania 19103
- I. Tampa Electric Company
Peoples Gas System, Inc.
Attn: Barbara Taulton FRP, CAP, Florida Registered
Paralegal
Tampa Electric Company
702 N. Franklin Street
Tampa, Florida 33602
- J. New York State Electric and Gas Corporation
Attn: Kelly Potter
James A. Carrigg Center
Bankruptcy Department
18 Link Drive
Binghamton, New York 13904
- K. Rochester Gas and Electric Corporation
Attn: Shannon Lawson
180 South Clinton Avenue
Rochester, New York 14607
- L. Virginia Electric and Power Company d/b/a Dominion
Energy Virginia
Attn: Sherry Ward
600 East Canal Street, 16th floor
Richmond, Virginia 23219
- M. Dominion Energy South Carolina, Inc.
Attn: Jay Bressler, Esq.
220 Operation Way
Cayce, South Carolina 29033

- N. The Connecticut Light & Power Company
Yankee Gas Services Company
Public Service Company of New Hampshire
Eversource Gas of Massachusetts
NStar Electric Company - Western Massachusetts
Attn: Honor S. Heath, Esq.
Eversource Energy
107 Selden Street
Berlin, Connecticut 06037
- O. PSEG Long Island
Attn: Brianna Maye, Back Office Collections
15 Park Drive
Melville, New York 11747
- P. Southern California Edison Company
Attn: Jeffrey S. Renzi, Esq.
Director and Managing Attorney
Southern California Edison Company, Law Department
2244 Walnut Grove Avenue
Rosemead, California 91770
- Q. CenterPoint Energy Resources Corp
Jeannetta Johnson
Credit Department, 31st Floor
CenterPoint Energy, Inc.
1111 Louisiana St.
Houston, Texas 77002
- R. Orange & Rockland Utilities, Inc.
Attn: Jennifer Woehrle
390 W. Route 59
Spring Valley, New York 10977
- S. Consolidated Edison Company of New York, Inc.
Attn: Bankruptcy
Customer Operations, Specialized Activities, 9th Floor
4 Irving Place
New York, New York 10003
- T. San Diego Gas & Electric Company
Attn: Kelli S. Davenport, Bankruptcy Specialist
8326 Century Park Court
San Diego, California 92123

U. Boston Gas Company
KeySpan Gas East Corporation
The Brooklyn Union Gas Company
Massachusetts Electric Company
Niagara Mohawk Power Corporation
Attn: Vicki Piazza, D-1
National Grid
300 Erie Boulevard West
Syracuse, New York 13202

V. Constellation NewEnergy, Inc.
Constellation NewEnergy - Gas Division, LLC

W. Gexa Energy, LP ("Gexa")
Attn: John Gray, Esq., Senior Counsel
601 Travis Street, Suite 1400
Houston, Texas 77002

2. The nature and the amount of claims (interests) of the Utilities, and the times of acquisition thereof are as follows:

(a) The following Utilities have unsecured claims against the above-referenced Debtors arising from prepetition utility usage: American Electric Power, Ohio Edison Company, Potomac Edison Company, West Penn Power Company, Pennsylvania Electric Company, Monongahela Power Company, Metropolitan Edison Company, Pennsylvania Power Company, Jersey Central Power & Light Company, Toledo Edison Company, The Cleveland Electric Illuminating Company, Virginia Electric and Power Company d/b/a Dominion Energy Virginia, Dominion Energy South Carolina, Inc., Georgia Power Company, PSEG Long Island , San Diego Gas and Electric Company, Southern California Edison Company, Baltimore

Gas and Electric Company, Commonwealth Edison Company, PECO Energy Company, The Potomac Electric Power Company, Delmarva Power & Light Company, Atlantic City Electric Company, Tampa Electric Company, Peoples Gas System, Inc., Eversource Gas of Massachusetts, The Connecticut Light & Power Company, Yankee Gas Services Company, Public Service Company of New Hampshire, NStar Electric Company - Western Massachusetts, Orange & Rockland Utilities, Inc., Consolidated Edison Company of New York, Inc., Constellation NewEnergy, Inc., Constellation NewEnergy - Gas Division, LLC, CenterPoint Energy Resources Corp., New York State Electric and Gas Corporation, Rochester Gas & Electric Corporation, Boston Gas Company, KeySpan Gas East Corporation, The Brooklyn Union Gas Company, Massachusetts Electric Company, Niagara Mohawk Power Corporation and Gexa Energy, LP.

(b) Salt River Project, Entergy Arkansas, LLC, Entergy Louisiana, LLC, Entergy Mississippi, LLC, Florida Power & Light Company and Tucson Electric Power Company held prepetition cash deposits that wholly secured prepetition debt.

(c) For more information regarding the claims and interests of the Utilities in these jointly-administered cases, refer to the *Objection of Certain Utility Companies to the Debtors' Motion For Interim and Final Orders (I) Prohibiting*

Utility Companies From Altering, Refusing, or Discontinuing Utility Services, (II) Deeming Utility Companies Adequately Assured of Future Payment, (III) Establishing Procedures For Resolving Objections By Utility Companies and Determining Additional Adequate Assurance of Payment, and (IV) Granting Related Relief (Docket No. 280) filed in the above-captioned, jointly-administered, bankruptcy cases.

3. The Law Firm of Russell R. Johnson III, PLC was retained to represent the foregoing Utilities in November 2024. The circumstances and terms and conditions of employment of the Firm by the Utilities is protected by the attorney-client privilege and attorney work product doctrine.

I verify under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge, information and belief.

Date: December 3, 2024

By: /s/ Russell R. Johnson III
Russell R. Johnson III (VSB No. 31468)
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Manakin-Sabot, Virginia 23103
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